

Judge Hellerstein

affecting interstate and foreign commerce, knowing that property

not named as defendants herein, in an offense involving and

DAVID DONADO, DENISE DONADO, the defendants, and co-conspirators

launders conspiracy that ALVARO ARDILA-ROJAS, a/k/a "Mickey,"

2. It was a part and an object of the money

violate Section 1966 (a)(1)(B) of Title 18, United States Code.

conspire, confederate and agree together and with each other to

unknown, unlawfully, willfully and knowingly did combine,

DONADO, DENISE DONADO, the defendants, and others known and

York and elsewhere ALVARO ARDILA-ROJAS, a/k/a "Mickey," DAVID

including in or about July 2005, in the Southern District of New

1. From in or about November 2004, up to and

The Grand Jury charges:

(Money Laundering Conspiracy)

COUNT ONE

----- x

: Defendants.

:
: DAVID DONADO,
: DENISE DONADO,

: a/k/a "Mickey,"

: ALVARO ARDILA-ROJAS,

: -v-

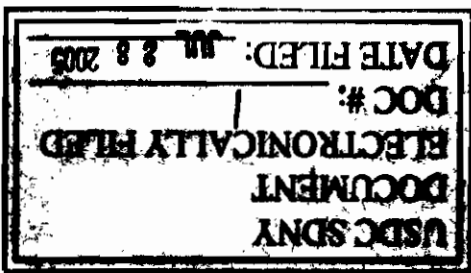
: UNITED STATES OF AMERICA

----- x

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

INDICTMENT

SI 05 CR. 708



JUG - 2, 2005

MICROFILM
-321

transportation of million dollar quantities of drug proceeds from

DENISE DONADO, the defendants, discussed the concealment and

b. On or about March 20, 2005, DAVID DONADO and

to conceal and transport these narcotics proceeds.

further agreed to send DAVID DONADO, the defendant, to New York

transportation of narcotics proceeds from New York to Mexico and

ROJAS, a/k/a "Mickey," the defendant, agreed to assist in the

a. On or about February 25, 2005, ALVARO ARDILA-

others, were committed:

the illegal object thereof, the following overt acts, among

3. In furtherance of said conspiracy and to effect

Overt Acts

United States Code

activity, in violation of Section 1956(a)(1)(B)(i) of Title 18,

ownership and control of the proceeds of specified unlawful

or in part to conceal and disguise the nature, location, source,

trafficking, knowing that the transactions were designed in whole

proceeds of specified unlawful activity, to wit, narcotics

conduct financial transactions, which in fact involved the

wilfully, and knowingly would and did conduct and attempt to

the proceeds of some form of unlawful activity, unlawfully,

custody and transfer of United States currency which represented

involved in certain financial transactions, to wit, the receipt,

defendants:

subject to forfeiture, as a result of any act or omission of the

5. If any of the property described above as being

Substitute Assets Provision

defendants are jointly and severally liable.

offense, or is traceable to such property for which the

property which was involved in the money laundering conspiracy

United States currency, in that such sum in the aggregate is

a. A sum of money no less than \$35,000,000 in

following:

traceable to such property, including but not limited to the

involved in the money laundering offense and all property

States Code, Section 982, all property, real and personal,

shall forfeit to the United States, pursuant to Title 18, United

a/k/a "Mickey," DAVID DONADO, DENISE DONADO, the defendants,

18, United States Code, Section 1956(h), ALVARO ARDILA-ROJAS,

alleged in Count One of this Indictment, in violation of Title

4. As a result of committing the foregoing offense

FORFEITURE ALLEGATION

(Title 18, United States Code, Section 1956(h).)

be used to package and conceal the narcotics proceeds.

New York to Mexico and supplied materials and devices that would

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third party;

c. has been placed beyond the jurisdiction of the court;

d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property.

(Title 18, United States Code, Section 982 and Title 18, United States Code, Section 1956).

DAVID N. KELLEY
United States Attorney

FOREPERSON

Form No. USA-335-274 (Ed. 9-25-58)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v -

ALVARO ARDILA ROJAS,
a/k/a "Mickey,"
DAVID DONADO,
DENISE DONADO

Defendants.

INDICTMENT

SI 05 Cr. 708

Title 18, United States Code,
Section 1956(h).

DAVID N. KELLEY
United States Attorney.

A TRUE BILL

Forfeiture.

7/18/05

1/18/05-7/18/05. Superseding Indictment
§ 85 Cr. 708. Arrest Warrants

Classified Case assigned to Judge Melton
for all purposes.

Attorney P. U.S. Mag.